

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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TEYO JOHNSON, :  
: Plaintiff, :  
: :  
-against- : Case No. 1:22-cv-06669(PAE)(GWG)  
: :  
EVERYREALM INC., COMPOUND ASSET :  
MANAGEMENT LLC, REALM METAVERSE :  
REAL ESTATE INC., REPUBLIC, REPUBLIC :  
CRYPTO LLC, REPUBLIC REALM MANAGER :  
LLC, REPUBLIC REALM INC., REPUBLIC :  
OPERATIONS LLC, OPENDEAL INC., :  
OPENDEAL PORTAL LLC, JULIA SCHWARTZ :  
in her individual and professional capacities, :  
WILLIAM KERR in his individual and :  
professional capacities, and JANINE YORIO in her :  
individual and professional capacities. :  
: Defendants. :  
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**DECLARATION OF**  
**WILLIAM KERR**

William Kerr, having personal knowledge of the facts herein, and under penalty of perjury, hereby states:

1. I currently serve as Chief Legal Officer of Everyrealm Inc. (f/k/a Republic Realm Inc.) (“Everyrealm”), and am a resident of the State of New York. I submit this Declaration based upon my personal knowledge and in support of the Motion to Dismiss Plaintiff’s Sexual Harassment Claim on behalf of Everyrealm Inc. (“Everyrealm”), Janine Yorio (“Mrs. Yorio”) Julia Schwartz (“Ms. Schwartz”), and myself (collectively “the Everyrealm Defendants”) in the above-captioned matter.

2. While employed by Everyrealm, Plaintiff Teyo Johnson (“Johnson”) worked remotely from Las Vegas, Nevada except for a one-week period.

3. On April 19, 2022, I sent a message via Everyrealm's Slack Instant Messenger application to Johnson to check in with him, because he was working remotely from Las Vegas, Nevada.

4. In response, Johnson sent a picture of several women, and a "selfie" of himself and the Las Vegas skyline.

5. I replied to Johnson by inquiring regarding the identity of one of the women in his photograph.

6. Johnson stated the woman was, "[a] 21 year old smoke show, her [boy friend] is older than me . . . Gonna snatch it up when they part ways! . . . Catch and release [Bill Kerr]!!".

7. A true and correct copy of the above-described correspondence is attached hereto as Exhibit A.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury the foregoing is true and correct.

Dated: November 2, 2022



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William Kerr